

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

DAVID AMBROSE, individually and on  
behalf of all others similarly situated,

Plaintiff,

v.

BOSTON GLOBE MEDIA PARTNERS,  
LLC,

Defendant.

Civil Action No. 1:22-cv-10195-RGS

Hon. Richard G. Stearns

**PLAINTIFF’S MOTION FOR ATTORNEYS’ FEES, COSTS,  
EXPENSES, AND INCENTIVE AWARD**

Plaintiff David Ambrose (“Plaintiff”) hereby moves this Court for an order (i) approving the payment of attorneys’ fees, costs, and expenses in the amount of one-third of the Settlement Benefit, (ii) granting Mr. Ambrose an incentive award of \$5,000 in recognition of his efforts on behalf of the class, and (iii) awarding such other and further relief as the Court deems reasonable and just.

Submitted in support of the Motion are Plaintiff’s Memorandum of Law in Support of Motion for Attorneys’ Fees, Costs, Expenses, and Incentive Award, the Declaration of Philip L. Fraietta in Support of Plaintiff’s Motion for Attorneys’ Fees, Costs, Expenses, and Incentive Award and accompanying exhibits, and the Declaration of David Ambrose in Support of Plaintiff’s Motion for Attorneys’ Fees, Costs, Expenses, and Incentive Award.

Dated: July 28, 2023

Respectfully submitted,

**BURSOR & FISHER, P.A.**

By: /s/ Philip L. Fraietta  
Philip L. Fraietta

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*Local Counsel for Plaintiff and the Settlement  
Class*